

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

COOPER MOORE and ANDREW  
GILLETTE, on their own behalf and on  
behalf of others similarly situated,

Plaintiffs,

v.

ROBINHOOD FINANCIAL LLC,

Defendant.

No. 2:21-cv-01571-BJR

**DECLARATION OF  
GINA INTREPIDO-BOWDEN  
REGARDING NOTICE PROGRAM  
IMPLEMENTATION, SETTLEMENT  
ADMINISTRATION, AND OPT OUT  
REQUESTS**

I, Gina Intrepido-Bowden, declare and state as follows:

1. I am a Vice President at JND Legal Administration LLC (“JND”), the Court-appointed Settlement Administrator in this case. This Declaration is based on my personal knowledge, as well as upon information provided to me by knowledgeable JND employees and, if called upon to do so, I could and would testify competently thereto.

2. JND previously filed a Declaration Regarding Settlement Notice Program filed



February 8, 2024, Docket No. 94 (“Notice Program Declaration”)<sup>1</sup>. This Declaration is being filed to update the Court regarding implementation of the Notice Program and Settlement administration and provide a list of all valid opt-outs received per paragraph 11 of the Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification (“Preliminary Approval Order”).

### **CAFA NOTICE**

3. On February 16, 2024, in compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, JND compiled a CD-ROM containing the following documents (with an accompanying cover letter and attachment of recipients):

- a. Complaint;
- b. First Amended Complaint;
- c. Notification to Class Members;
- d. Settlement Agreement and Release of Claims (with Exhibits);
- e. Settlement Terms Sheet;
- f. Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification;
- g. Declaration of Beth E. Terrell in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification;
- h. Declaration of E. Michelle Drake in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification;
- i. Declaration of Gina Intrepido-Bowden Regarding Settlement Notice Program; and
- j. Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class

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<sup>1</sup> All capitalized terms not defined herein have the meanings given to them in the Notice Program Declaration, unless otherwise indicated.



Action Settlement and Conditional Class Certification.

4. A true and correct copy of the CAFA Notice and list of recipients is attached hereto as Exhibit A.

**SETTLEMENT WEBSITE**

5. Pursuant to paragraph 3.03.02 of the Settlement Agreement, on February 27, 2024, JND established a Settlement Website, [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com), to provide additional information to Class Members to learn more about the case and proposed Settlement. The “Home” page provides a summary of the proposed Settlement, key dates, and an overview of legal rights and options. The “File a Claim” page allowed Class Members to file a Claim Form through the May 13, 2024 claims deadline. In addition, the “Look Up Tool” page allowed Class Members to search for their Claims Code and/or telephone number where they received the Robinhood Referral text message to see if the telephone number could be matched to a telephone number in the Class List data. An “Important Documents” page provides downloadable PDF copies of important Court documents, Long Form Notice of Settlement, First Amended Complaint, Preliminary Approval Order, Settlement Agreement, and all documents relating to Plaintiffs’ fee petition. The “FAQ” page provides answers to frequently asked questions. There are also separate “Key Dates,” and “Contact Us” pages detailing how Class Members can request information by email, toll-free telephone, and mail.

6. As of May 30, 2024, there were 1,407,256 total views of the Settlement Website pages and documents and 539,076 unique visitors to the Settlement Website. JND will continue to maintain the Settlement Website throughout the Settlement administration process.

**TOLL-FREE TELEPHONE NUMBER**

7. Pursuant to paragraph 3.03.03 of the Settlement Agreement, on February 6, 2024, JND



1 established a Settlement-specific dedicated toll-free Interactive Voice Response (“IVR”) number, 1-  
2 877-231-0646, for Class Members to call for additional information regarding the proposed  
3 Settlement. The IVR is available twenty-four hours a day, seven days a week in English.

4 8. As of May 30, 2024, JND has received 2,813 calls to the IVR.

5 9. JND will continue to maintain the Settlement toll-free number throughout the  
6 Settlement administration process.

7  
8 **CLASS LIST DATA TRANSFER**

9 10. On February 21, 2024, Class Counsel provided JND with electronic files containing  
10 the telephone numbers, email addresses, and last known mailing addresses of potential members of  
11 the Settlement Class. The files contained a total of 1,122,343 records. JND analyzed the data and  
12 removed duplicate entries based on full name, mailing address, and phone number. After  
13 deduplication, 827,327 unique valid telephone numbers remained. JND then used industry standard  
14 practices, including reverse lookups, to locate complete contact information for potential Class  
15 Members whose complete contact information had not been provided in the data transfer.  
16

17 11. After duplication and reverse lookups, 1,424,865 unique records were created and  
18 loaded into a dedicated database for this Settlement.

19  
20 **DIRECT EMAIL NOTICE**

21 12. Pursuant to paragraph 3.03.04 of the Settlement Agreement, on March 14, 2024, JND  
22 completed dissemination by electronic mail of a summarized version of the Notice (“Email Notice”)  
23 to 1,126,513 Settlement Class Member email addresses. Email addresses were included in the Class  
24 List Data and obtained through an advanced level search of Class Member contact information  
25 provided in the Class List Data. Email Notice was issued to all Class Member email addresses  
26 provided in the Class List Data and located through this search. Multiple email addresses were located  
27 for many Class Members. A representative copy of the Email Notice is attached hereto as Exhibit B.  
28



13. Of the 1,126,513 Class Member email addresses sent Email Notice, 971,601 or 86.25% were deemed delivered and 154,912 or 13.75% were deemed undeliverable.

### **DIRECT POSTCARD NOTICE**

14. Pursuant to paragraph 3.03.05 of the Settlement Agreement, on March 14, 2024 JND mailed the Postcard Notice by first-class regular USPS mail, postage prepaid, to the 364,010 Class Members for whom an email address is not available or deliverable and for whom a postal address is available or located through reverse lookup. Prior to mailing Class Notice, JND updated Class Member address information using data from the National Change of Address (NCOA) database.<sup>2</sup> A representative copy of the Post Card Notice is attached hereto as Exhibit C.

15. As of May 30, 2024, 45,485 Postcard Notices were returned to JND as undeliverable. JND re-mailed 17 Postcard Notices to forwarding addresses provided by the USPS. In addition, JND performed advanced address research for the undeliverable Postcard Notices without forwarding addresses and re-mailed 6,905 Postcard Notices to a new address.

16. As of May 30, 2024, of the 364,010 Postcard Notices mailed, 325,447 or 89% were deemed delivered, and 38,563 or 11% were deemed undeliverable.

### **REMINDER NOTICES**

17. Pursuant to section 3.03 of the Settlement Agreement, beginning on April 12, 2024, at least 30 days prior to the claims deadline of May 13, 2024, JND issued two rounds of Email Reminder Notices and Postcard Reminder Notices to any Class Members who had yet to file a Claim. Postcard Reminder Notices were mailed by first-class regular USPS mail, postage prepaid.

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<sup>2</sup> The NCOA database is the official United States Postal Service ("USPS") technology product which makes change of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person has completed a change of address form with the USPS. The address information is maintained in the database for 48 months.



18. On April 12, 2024, JND completed dissemination the first Email Reminder Notice to 970,422 Class Members who had not yet filed a Claim, of which 954,118 or 98.3% were deemed delivered and 16,304 or 1.7% were deemed undeliverable. A representative copy of the Email Reminder Notice is attached hereto as Exhibit D.

19. On April 12, 2024, JND mailed first Postcard Reminder Notices to 357,075 Class Members who had not yet filed a Claim, of which, 318,928 or 89.3% were deemed delivered and 38,147 or 10.7% were deemed undeliverable. A representative copy of the Postcard Reminder Notice is attached hereto as Exhibit E.

20. On April 29, 2024, JND completed dissemination of a second Email Reminder Notice to 969,051 Class Members who had not yet filed a Claim, of which, 961,186 or 99.2% were deemed delivered and 7,865 or 0.8% were deemed undeliverable.

21. On April 29, 2024, JND mailed a second Postcard Reminder Notice to 324,576 Class Members who had not yet filed a Claim, of which, 323,410 or 99.6% were deemed deliverable and 1,166 or .04% were deemed undeliverable.

### **SUPPLEMENTAL DIGITAL NOTICE EFFORT TO WASHINGTON STATE**

22. To supplement the direct notice effort, JND caused a targeted digital effort to launch in the state of Washington through the Google Display Network (“GDN”), Facebook, and Instagram. Digital advertisements appeared for four weeks from March 14 through April 10, 2024. In total, 4,786,539 digital impressions were served to adults 18 years of age or older (“Adults 18+”) in the state of Washington, 486,539 more than what was originally planned.<sup>3</sup>

23. A portion of the GDN impressions was allocated to users who have an affinity for

<sup>3</sup> Impressions or Exposures are the total number of opportunities to be exposed to a media vehicle or combination of media vehicles containing a notice. Impressions are a gross or cumulative number that may include the same person more than once. As a result, impressions can and often do exceed the population size.



1 Robinhood, Digital Wallet, Stock Trading and/or Stock Market Advice and a portion of the  
2 Facebook/Instagram impressions was targeted to users who have expressed an interest in day trading,  
3 digital currency, stock (investing), stock exchange, stock market, digital wallet (software) and/or  
4 investing (business & finance). Multiple targeting techniques were used, including predictive  
5 targeting (GDN only), audience targeting, geotargeting, keyword targeting, and machine learning.

6 24. The digital activity was served across all devices (desktop, laptop, tablet and mobile),  
7 with a heavy emphasis on mobile devices. The digital ads linked to the Settlement website, where  
8 Settlement Class Members could access more information about the Settlement, including the Long  
9 Form Notice, as well as file a claim electronically.

10 25. Screenshots of the digital ads as they appeared on GDN, Facebook, and Instagram are  
11 attached as Exhibit F.

12  
13 **SUPPLEMENTAL DIGITAL EFFORT TO TOP MIGRATION STATES**

14  
15 26. To extend reach to Settlement Class Members who may have moved from Washington  
16 state during the Class period, JND also caused a digital effort to launch in the Top Migration States  
17 of Arizona, California, Oregon and Texas on Facebook and Instagram. Digital advertisements  
18 appeared for four weeks from March 14 through April 10, 2024. In total, 1,073,539 digital  
19 impressions were served, 73,539 more than what was originally planned. The impressions targeted  
20 Adults 18+ in the Top Migration States who have expressed an interest in day trading, digital  
21 currency, stock (investing), stock exchange, stock market, digital wallet (software) and/or investing  
22 (business & finance) AND are away from family/hometown or recently moved.

23  
24 **SUPPLEMENTAL CUSTOM AUDIENCE EFFORT TO KNOWN POTENTIAL**

25 **SETTLEMENT CLASS MEMBERS**

26  
27 27. JND also caused a custom audience digital effort to known Settlement Class Member



1 based on provided Settlement Class Member data such as phone numbers, emails, and/or postal  
2 addresses to launch nationwide with GDN, Facebook, and Instagram. Digital advertisements appeared  
3 for four weeks from March 14 through April 10, 2024. In total, 3,875,436 impressions were served,  
4 375,436 more than what was originally planned.

#### 5 **INTERNET SEARCH CAMPAIGN**

6  
7 28. JND caused 13,007 impressions to be delivered through an internet search effort to  
8 from March 14 through April 10, 2024. When purchased keywords related to the Settlement (e.g.,  
9 content on the Settlement website landing page, legal names of the cases, as well as other case  
10 information) were searched, a paid Responsive Search Ad (“RSA”) with a hyperlink to the Settlement  
11 website would sometimes appear on the search engine results page. When the RSA was clicked on,  
12 the visitor was redirected to the Settlement website where they could get more information. The  
13 search effort was monitored and optimized.  
14

15 29. Screenshots of the RSAs are attached as Exhibit G.

#### 16 **PRESS RELEASE**

17  
18 30. To further assist in getting “word of mouth” out about the Settlement, on March 14,  
19 2024, JND caused a press release to be distributed to media outlets throughout the U.S. The release  
20 was picked up 513 times, reaching a potential audience of 156.3 million.

21 31. A copy of the press release as distributed is attached as Exhibit H.

#### 22 **REACH**

23  
24 32. Of the 827,327 unique telephone numbers that comprise the identified Settlement  
25 Class, at least one Email Notice or Post Card Notice was deemed delivered for 795,307 of those  
26 numbers. The direct email and mail efforts combined reached 96% of the identified unique telephone  
27 numbers representing Settlement Class Members. The supplemental digital efforts, press release,  
28



1 internet search and reminder notices extended the reach and notice exposures further. The provided  
2 reach exceeds that of other court approved programs and is on the high-end of the standard set forth  
3 by the FJC.<sup>4</sup>

#### 4 **OBJECTIONS**

5  
6 33. Pursuant to paragraph 3.04 of the Settlement Agreement, the Email Notice, Postcard  
7 Notice, Long Form Notice, and Settlement Website informed Class Members that those who wanted  
8 to object to the Settlement could do so by May 13, 2024.

9 34. As of May 30, 2024, JND is not aware of any Settlement objections.

#### 10 **REQUESTS FOR EXCLUSION**

11  
12 35. Pursuant to paragraph 3.04 of the Settlement Agreement, the Email Notice, Postcard  
13 Notice, Long Form Notice, and Settlement Website informed Class Members that those who wanted  
14 to be excluded from the Settlement could do so by May 13, 2024.

15 36. As of May 30, 2024, JND has received five (5) valid exclusion requests. A list of the  
16 timely and valid exclusions is attached hereto as Exhibit I.

#### 17 **CLAIM FORMS AND CLAIM FORM VERIFICATION PROCESS**

18  
19 37. Per the terms of the Settlement Agreement, the deadline for Class Members to submit  
20 a Claim was May 13, 2024. As of May 30, 2024, JND has cumulatively received 51,536 timely  
21 Claims (47,443 filed online and 4,093 filed by mail). Additionally, 86 late Claims have been received.

22 38. Pursuant to paragraph 4.04 of the Settlement Agreement, JND is in the process of  
23 reviewing Claims to determine validity and completeness and will continue to do so. As of today's  
24

25  
26  
27 <sup>4</sup> Federal Judicial Center, Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide (2010),  
28 p. 3 states: "...the lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the  
notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70–95%."



1 date, JND has validated 30,745 non-fraudulent Claims. This number could increase to more than  
2 50,000 before the Final Approval Hearing as JND completes its review of Claims and Claimants are  
3 provided an opportunity to cure deficient Claims.

4 39. JND will continue to administer the Settlement through all phases of Settlement  
5 Administration, as required by the Settlement Agreement, Preliminary Approval Order, and pursuant  
6 to any future orders of this Court.

7  
8 **SETTLEMENT EXPENSES**

9 40. JND has exceeded the estimated \$670,000 cost to administer the Settlement by  
10 approximately \$300,000. This increase is due primarily to the fact that JND had to mail over 350,000  
11 more Post Card Notices and Post Card Reminder Notices than originally anticipated. JND anticipates  
12 incurring an additional \$95,000 in costs for administration of the deficiency notice and response  
13 review and the distribution of funds.

14  
15  
16 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
17 is true and correct.

18 Executed on June 12, 2024, in Philadelphia, Pennsylvania.

19  
20 

21 \_\_\_\_\_  
GINA INTREPIDO-BOWDEN



# EXHIBIT A





Suite 3300  
920 Fifth Avenue  
Seattle, WA 98104-1610

**Ken Payson**  
**Partner, Commercial Litigation**  
206.757.8126 tel

kenpayson@dwt.com

February 16, 2024

*Via USPS Priority Mail*

**Merrick Garland**  
**Office of the U.S. Attorney General**  
**U.S. Department of Justice**  
**950 Pennsylvania Ave NW**  
**Washington, DC 20530**

Re: **CAFA Notice of Proposed Settlement**  
*Moore, et al. v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (United States  
District Court for the Western District of Washington)

Dear Federal or State Official:

I write as counsel to Defendant Robinhood Financial LLC (“Defendant”) in the above-referenced matter pending in the United States District Court for the Western District of Washington. Pursuant to 28 U.S.C. § 1715, Defendant hereby provides notice of a proposed class action settlement in that matter. Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included in the enclosed CD-ROM:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the complaint and amended complaint are enclosed.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** The Court has scheduled a final approval hearing for July 16, 2024 at 10:00 a.m. Pacific time.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** A copy of the notice to be provided to the class is enclosed.
4. **28 U.S.C. § 1715(b)(4) – Proposed Class Action Settlement Agreement:** A copy of the proposed *Settlement Agreement and Release of Claims* is enclosed.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** A *Settlement Terms Sheet* is enclosed. As of the date of this letter, aside from the *Settlement Agreement and*



Federal or State Official  
February 16, 2024  
Page 2

*Release of Claims* and the *Settlement Terms Sheet*, no other settlement or agreement has been made between class counsel and Defendant's counsel.

6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** As of the date of this letter, no final judgment or notice of dismissal have been entered in the action.

7. **28 U.S.C. § 1715(b)(7)(A) & (B) – Names of Class Members and Estimated Proportionate Share:** Providing the names of class members is not feasible at this time. 28 U.S.C. § 1715(b)(7)(A). Plaintiffs' counsel estimates the number of class members is approximately 1.3 million. 28 U.S.C. § 1715(b)(7)(B). Based on the settlement administrator's analysis, the estimated number of class members residing in each state and estimated proportionate share of the claims of such members to the entire settlement are as follows: WA (1,172,887 members, 90.22%); CA (40,778 members, 3.14%); OR (27,619 members, 2.12%); AZ (21,360 members, 1.64%); TX (21,088 members, 1.62%); ID (16,268 members, 1.25%).

8. **28 U.S.C. § 1715(b)(8) – Written Judicial Opinions Related to the Settlement:** As of the date of this letter, the only judicial opinion related to the materials described in 28 U.S.C. § 1715(b)(3)-(6) is the *Order Granting Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification*, a copy of which is enclosed.

9. **Other Material:** Although not required under 28 U.S.C. § 1715, also enclosed are (a) *Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification*, (b) *Declaration of Beth E. Terrell in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification*, (c) *Declaration of E. Michelle Drake in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Conditional Class Certification*, and (d) *Declaration of Gina Intrepido-Bowden Regarding Settlement Notice Program*.

Defendant will ask the Court to find that this Notice complies with 28 U.S.C. § 1715.

Defendant does not intend to supplement this Notice. If you have questions about this Notice, the lawsuit, or the enclosed materials, or if you did not receive any of the listed materials, please feel free to contact me.

Very truly yours,

Davis Wright Tremaine LLP



Enclosures



***Moore, et al. v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR CAFA Notice –  
Attachment A – Service List**

CAFA Coordinator  
Office of the Attorney General  
Consumer Protection Section  
455 Golden Gate Ave., Ste 11000  
San Francisco, CA 94102

Merrick Garland  
Office of the U.S. Attorney General  
U.S. Department of Justice  
950 Pennsylvania Ave NW  
Washington, DC 20530

Bob Ferguson  
Office of the Attorney General  
1125 Washington St SE  
Olympia, WA 98501

Balbiro Kazla, Dep Commr.  
DFPI, BDIA Division  
2101 Arena Boulevard Ste 269  
Sacramento, CA 95834

Ellen F. Rosenblum  
Oregon Department of Justice  
Justice Building  
1162 Court St NE  
Salem, OR 97301

TK Keen, Administrator  
Division of Financial Regulation  
350 Winter St NE Rm 410  
Salem, OR 97301

Kris Mayes  
Office of the Attorney General  
2005 N Central Ave  
Phoenix, AZ 85004

Mark Dinell, Director  
ACC Securities Division  
1300 W Washington St 3rd Fl  
Phoenix, AZ 85007

Ken Paxton  
Office of the Attorney General  
300 W. 15th St  
Austin, TX 78701

Travis Iles, Commr  
Texas State Securities Board  
208 E 10th St Rm 610  
Austin, TX 78701

Raúl R. Labrador  
Office of the Attorney General  
700 W. Jefferson St, Suite 210  
Boise, ID 83720

John Yaros, Bureau Chief  
Securities Bureau  
Idaho Dept of Finance  
11341 W Chinden Blvd. Bldg 4, Fl 3  
Boise, ID 83714

William Beatty, Director  
Dept of Financial Institutions  
Securities Division  
150 Israel Rd SW  
Tumwater, WA 98501

William Beatty, Director  
Dept of Financial Institutions  
Securities Division  
PO Box 41200  
Olympia, WA 98504



# EXHIBIT B



**From:** info@robinhoodreferralsettlement.com on behalf of Robinhood Referral Settlement Administrator <info@robinhoodreferralsettlement.com>  
**Sent:** Friday, March 1, 2024 9:10 AM  
**To:** [REDACTED]  
**Subject:** Notice of Class Action Settlement – Moore v. Robinhood Financial LLC

**Security Notice:** This email originated outside of JND. Use caution when clicking links or opening attachments.

Claims Code: 12345678

**If you received a Robinhood referral text message while residing in Washington, you may be entitled to payment because of a class action settlement.**

**This Legal Notice Was Authorized by the Court**

**Your rights and options are explained in this notice. Please read this notice carefully. Full information regarding the settlement is available at [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com).**

You are receiving this notice because you have been identified as a potential Settlement Class member in a class action lawsuit entitled *Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (W.D. Wash.) (the "Lawsuit"). The parties have reached a proposed \$9 million settlement in the Lawsuit. The settlement has not been approved by the Court yet. This notice explains your options. **To receive a payment if you are a Settlement Class member, you must submit a valid Claim Form by May 13, 2024.** Payments are estimated to be between \$45 and \$90 per Settlement Class Member that files a timely and valid Claim Form. You may submit a Claim Form online at [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com) or by clicking the link below.

**[FILE A CLAIM](#)**

The Lawsuit claims that Robinhood Financial LLC ("Robinhood" or "Defendant") violated Washington state laws, including Washington's Commercial Electronic Mail Act ("CEMA") and the Washington Consumer Protection Act ("CPA"), by substantially assisting Robinhood users in the transmission of unsolicited commercial text messages to prospective



customers as a part of its refer-a friend marketing program. Specifically, the Class Representatives allege that Robinhood's trading app allowed users to generate and send pre-filled text messages to users' contacts without first obtaining the recipients' clear and affirmative consent to receive commercial text messages. Under these laws, a person is entitled to receive at least \$500 for each text message sent in violation of the law. The court also may award triple damages and attorneys' fees.

Robinhood denies any wrongdoing and the Court has not decided whether Robinhood did anything wrong. Robinhood has asserted defenses that it believes would be successful at trial. In agreeing to settle, Robinhood maintains that it complied with the law and does not admit any wrongdoing. The Lawsuit is proceeding in the United States District for the Western District of Washington before the Honorable Judge Barbara J. Rothstein.

For additional details regarding the Lawsuit and your rights, visit [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com).

**Am I a Class Member?** Defendant's records show that you may have received a text message inviting you to sign up for Robinhood through the refer-a-friend marketing program. You are a member of the Settlement Class if you (1) received a Robinhood referral program text message between August 9, 2017 and February 13, 2024, (2) were a Washington resident at the time you received the text, and (3) you did not clearly and affirmatively consent in advance to receive the text.

**Your Legal Rights and Options.** You must decide whether to stay in the Settlement Class or exclude yourself.

**File A Claim Form by May 13, 2024.** If you are a member of the Settlement Class, you have a right to complete a Claim Form to share in the settlement proceeds paid by Robinhood to settle the Lawsuit. It is estimated that Settlement payments will range between \$45 and \$90 per Settlement Class Member, although the actual amount could be higher or lower depending on how many valid Claim Forms are received. A Claim Form can be obtained from the settlement website at [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com). A Claim Form can be (a) completed and submitted electronically on the website, or (b) printed, completed, and submitted by mail. If your Claim Form is approved and the Settlement is approved by the Court and becomes final, you give up your right to bring your own lawsuit about the issues in this Lawsuit.

**Do Nothing.** If you do nothing and the Settlement becomes final, you will not be issued a Settlement payment. If you are a member of the Settlement Class and the Settlement is approved by the Court and becomes final, you give up your right to bring your own lawsuit about the issues in this Lawsuit.



**Exclude Yourself by May 13, 2024.** If you exclude yourself from the Settlement (also called “opting out”), you give up your right to receive a Settlement payment, but you retain any rights you may have to bring your own lawsuit about the issues in this Lawsuit. To exclude yourself from the Settlement Class, you must mail a written “Request for Exclusion” to the Settlement Administrator that is postmarked by May 13, 2024. Your written request must include: (i) your name, address, and telephone number; (ii) a statement confirming that you want to exclude yourself from the Settlement Class; (iii) the case name and number (*Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (W.D. Wash.)); and (iv) your signature and the date.

**Object or Comment by May 13, 2024.** If you do not exclude yourself from the Settlement, you may object to or comment about the Settlement and/or Class Counsel’s request for attorneys’ fees, expenses, and service awards to the Class Representatives who brought this Lawsuit.

**Who Represents Me?** The Court has appointed a team of lawyers from Terrell Marshall Law Group PLLC and Berger Montague PC to serve as Class Counsel. They will ask the Court to pay them attorneys’ fees not to exceed 25% of the \$9 million settlement fund (\$2,250,000), out of pocket costs currently estimated to be \$151,215, and Class Representative Awards of \$10,000 each to Plaintiffs Cooper Moore and Andrew Gillette (\$20,000 total).

**When Will the Court Consider the Settlement?** The Court will hold a Final Approval Hearing at 10:00 a.m. on July 16, 2024. At that hearing, the Court will hear any objections concerning the fairness of the Settlement, decide whether to approve the requested attorneys’ fees and costs, Class Representative awards, and determine whether the Settlement should be approved.

**Where can I get more information?** A more detailed notice and important case documents are at [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com). If you have any questions, please contact the Settlement Administrator at 877-231-0646. Do not contact the Court with questions.

**Questions? Visit**  
**[www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com) or Call 877-231-0646**

To unsubscribe from this list, please click on the following link: [unsubscribe](#)



# EXHIBIT C



COURT ORDERED NOTICE

Moore v. Robinhood  
Financial LLC

Class Action  
Settlement Notice

If you received a Robinhood  
referral text message while  
residing in Washington, you  
may be entitled to payment.

Claims Deadline is  
May 13, 2024

Robinhood Referral Settlement  
c/o JND Legal Administration  
PO Box 91166  
Seattle, WA 98111



Claims Code: «CLAIMS CODE»

Postal Service: Please do not mark barcode

«NAME»  
«ADDRESS1»  
«ADDRESS2»  
«CITY»«STATE»«POSTAL CODE»  
«COUNTRY»

CLAIM FORM

First Name MI Last Name

Business Name (If applicable) Street Address

City State ZIP Contact Phone Number(s)

Email Address

Phone Number(s) where texts were received:

1. ( ) -  
2. ( ) -  
3. ( ) -

I declare under the penalty of perjury under the laws of the  
United States of America that the foregoing is true and correct.

Signature

Date

I attest that the following statements are true:

- I received one or more Robinhood referral program text messages from a Robinhood customer on the cellular telephone number I provided on the left of this Form;
- I owned or was the regular user of that phone number at the time I received at least one Robinhood referral text message;
- I was a Washington resident at the time I received at least one Robinhood referral program text message; and
- I did not clearly and affirmatively consent in advance to receive at least one Robinhood referral program text message I received while a Washington resident.



You have been identified as a potential Settlement Class Member in a class action lawsuit entitled *Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (W.D. Wash.) (the “Lawsuit”). The parties have reached a proposed \$9 million settlement in the Lawsuit and you may be entitled to payment. The Lawsuit claims that Robinhood violated Washington state law by substantially assisting Robinhood users in the transmission of unsolicited commercial text messages as a part of its refer-a friend marketing program. Robinhood denies any wrongdoing and the Court has not decided whether Robinhood did anything wrong. Robinhood has asserted defenses it believes would be successful at trial. In agreeing to settle, Robinhood maintains that it complied with the law. The Lawsuit is proceeding in the United States District Court for the Western District of Washington before the Honorable Judge Barbara J. Rothstein.

**Am I a Class Member?** You are a Settlement Class Member if you (1) received a Robinhood referral program text message between August 9, 2017 and February 13, 2024; (2) were a Washington resident at the time you received the text; and (3) you did not clearly and affirmatively consent in advance to receive the text.

**Your Choices.** You must decide whether to stay in the Settlement Class or exclude yourself. If you are a member of the Settlement Class, you must complete a Claim Form by May 13, 2024 to obtain a Settlement payment, estimated to be between \$45 and \$90, although the actual amount may vary depending on how many valid Claim Forms are received. A Claim Form can be obtained from [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com). If you do nothing, you will stay in the Settlement Class, not receive a Settlement payment, and give up your right to bring your own lawsuit about the issues in this Lawsuit. If you exclude yourself from the Settlement Class, you will give up your right to receive a Settlement payment, but you will retain any rights you may have to bring your own lawsuit about the issues in the Lawsuit. To exclude yourself from the Settlement Class, you must mail a written “Request for Exclusion” to the Settlement Administrator that is postmarked by May 13, 2024 that contains: (i) your name, address, and telephone number; (ii) a statement confirming that you want to exclude yourself from the Settlement Class; (iii) the case name and number; and (iv) your signature and the date.

**Who Represents Me?** The Court has appointed lawyers from Terrell Marshall Law Group PLLC and Berger Montague PC to serve as Class Counsel. They will petition to be paid legal fees not to exceed 25% of the settlement fund (\$2,250,000), out of pocket costs, estimated to be \$151,215, and Class Representative Awards of \$10,000 each to Plaintiffs Cooper Moore and Andrew Gillette.

**Where can I get more information?** A more detailed notice and important case documents are at [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com). For further information, you may also contact Class Counsel at (206) 454-7308.

RE: *Moore v. Robinhood Financial LLC*,  
Case No. 2:21-cv-01571-BJR

To receive benefits from this Settlement, you can mail in this Claim Form postmarked on or before May 13, 2024.

You must complete all sections and sign at the bottom before returning this form.

If the phone number where you received the referral text message(s) cannot be verified, the Settlement Administrator will contact you at the email address you provide to request additional information. You must notify the Settlement Administrator if your contact information changes after you submit this Form.

You may contact the Settlement Administrator at [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com). You may also complete and submit a Claim Form online and select how you want to receive payment.

**You may only submit one claim.**

PLACE  
STAMP  
HERE

Claims Code: «CLAIMS CODE»

Robinhood Referral Settlement  
c/o JND Legal Administration  
PO Box 91166  
Seattle, WA 98111



# EXHIBIT D



**From:** Robinhood Referral Settlement Administrator <info@robinhoodreferralsettlement.com>  
**Sent:** Thursday, April 11, 2024 9:59 PM  
**To:** [REDACTED]  
**Subject:** Notice of Class Action Settlement – Moore v. Robinhood Financial LLC

**Security Notice:** This email originated outside of JND. Use caution when clicking links or opening attachments.

**Claims Code: 12345678**

**If you received a Robinhood referral text message while residing in Washington, you may be entitled to payment because of a class action settlement.**

**This Legal Notice Was Authorized by the Court**

You previously received notice of a Settlement in a class action lawsuit against Robinhood Financial LLC ("Robinhood") in the case of *Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (W.D. Wash.). You have been identified as a potential Settlement Class member and **you must submit a valid Claim Form by May 13, 2024 to receive a Settlement payment.** It is estimated that Settlement payments will range between \$45 and \$90 per Settlement Class Member, although the actual amount could be higher or lower depending on how many valid Claim Forms are received.

You are a member of the Settlement Class if you (1) received a Robinhood referral program text message between August 9, 2017 and February 13, 2024; (2) were a Washington resident at the time you received the text; and (3) you did not clearly and affirmatively consent in advance to receive the text.

If you are a member of the Settlement Class, you must complete a valid Claim Form by May 13, 2024 to obtain a Settlement payment if the Settlement is approved. A Claim Form can be obtained from [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com).

For more information visit [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com) or call 877-231-0646.

To unsubscribe from this list, please click on the following link: [unsubscribe](#)



# EXHIBIT E



COURT ORDERED NOTICE

*Moore v. Robinhood  
Financial LLC*

**Class Action  
Settlement Notice**

*If you received a Robinhood  
referral text message while  
residing in Washington, you  
may be entitled to payment.*

Claims Deadline is  
May 13, 2024

*Robinhood Referral Settlement*  
c/o JND Legal Administration  
PO Box 91166  
Seattle, WA 98111

<<**BARCODE**>> Claims Code: «CLAIMS CODE»  
Postal Service: Please do not mark barcode

«NAME»  
«ADDRESS1»  
«ADDRESS2»  
«CITY»«STATE»«POSTALCODE»  
«COUNTRY»



**REMINDER NOTICE**

You previously received notice of a Settlement in a class action against Robinhood Financial LLC in the case of *Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (W.D. Wash.). You have been identified as a potential Settlement Class member. **To receive a Settlement payment, you must submit a valid Claim Form by May 13, 2024.** It is estimated that Settlement payments will range between \$45 and \$90 per Settlement Class Member, although the actual amount could be higher or lower depending on how many valid Claim Forms are received.

You are a member of the Settlement Class if you (1) received a Robinhood referral program text message between August 9, 2017 and February 13, 2024; (2) were a Washington resident at the time you received the text; and (3) you did not clearly and affirmatively consent in advance to receive the text.

If you are a member of the Settlement Class, you must complete a Claim Form by May 13, 2024 to obtain a Settlement payment. A Claim Form can be obtained from [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com).

For more information visit [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com) or call (877) 231-0646.



# EXHIBIT F



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transportation for passengers and cargo throughout the U.S. and around the world and includes its loyalty program, as well as other ancillary businesses. Its refinery segment operates for the benefit of the airline segment by providing jet fuel to the airline segment from its own production and through jet fuel obtained through agreements with third parties. The refinery segment's production consists of jet fuel, as well as non-jet fuel products.

The company has a Value Grade of A, based on its Value Score of 88, which is deep value. The Value Grade is the percentile rank of the average of the percentile ranks of the price-to-sales (P/S) ratio, price-earnings (P/E) ratio, price-to-book-value (P/B) ratio, price-to-free cash flow (P/FCF) ratio, shareholder yield and the ratio of enterprise value to earnings before interest, taxes, depreciation and amortization (Ebitda).

Delta Air Lines' Value Score is based on several traditional valuation metrics. The company has a rank of 18 for the price-to-sales ratio, 39 for shareholder yield and 63 for the price-to-book ratio. The company has a price-to-sales ratio of 0.47, a shareholder yield of 0.8% and a price-to-book ratio of 2.46. Lower price-to-sales and price-to-book ratios are considered better. Delta Air Lines' price-to-sales ratio is well below the sector median of 1.37, and its price-to-book ratio is slightly higher than the sector median of 2.30.

ADVERTISEMENT

LEGAL NOTICE

**Received a Robinhood referral text while residing in Washington?**

File a claim for payment in a class action settlement.

[LEARN MORE](#)



10:09

CBS | NCAA WBB

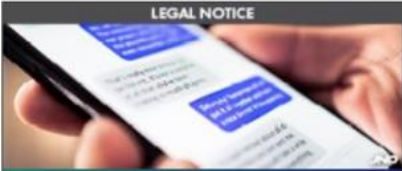
HOME SCORES STANDINGS RANKINGS NCAA TOURNA

because Brink has been dealing with a hip contusion after taking a fall against Cal earlier in the Pac-12 Women's Tournament.

"You can only take so much ibuprofen," Brink said, "and it's like, what can you do for a contusion?"

In her case, the Stanford trainer grabs a pair of gloves, a healthy scoop of Icy Hot and provides instant relief that will get Brink back into action. "I put my body through a lot, so it just it's a great partnership," Brink said.

LEGAL NOTICE



**Received a Robinhood referral text while residing in Washington?**  
File a claim for payment in a class action settlement.

[LEARN MORE](#)

Between playing elite NCAA basketball at Stanford and 3x3 with USA Basketball over the summer, Brink has been focused on recovery in a


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### McDonald's stores hit by global IT failure



Wall Street Journal: Latam Air flight plunge might have been caused by a mistake in the cockpit




### Fox News sued by family of Ukrainian journalist killed while covering war over 'reckless and negligent conduct'

Biden says it's 'vital' US Steel remain American owned and operated

Dollar General is rolling back self-checkout in thousands of stores

LEGAL NOTICE



**Received a Robinhood referral text while residing in Washington?**  
File a claim for payment in a class action settlement.

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**LEGAL NOTICE**

Received a Robinhood referral text while residing in Washington? File a claim for payment in a class action settlement.

**LEARN MORE**



US MARKETS OPEN IN:  
0h 1m 23s

▲ DOW JONES -0.35% ▲ NASDAQ -0.3% ▲ S&P 500 -0.29% ▼ META +0.1% ▼ TSLA +0.19% ▲ AAPL -0.42%

TRANSPORTATION

**Cybertruck engineer asks Tesla owners to please stop beating up the 'tortured' truck**



TRANSPORTATION

**A Boeing whistleblower says he got off**



STOCK PHOTO BY GETTY IMAGES

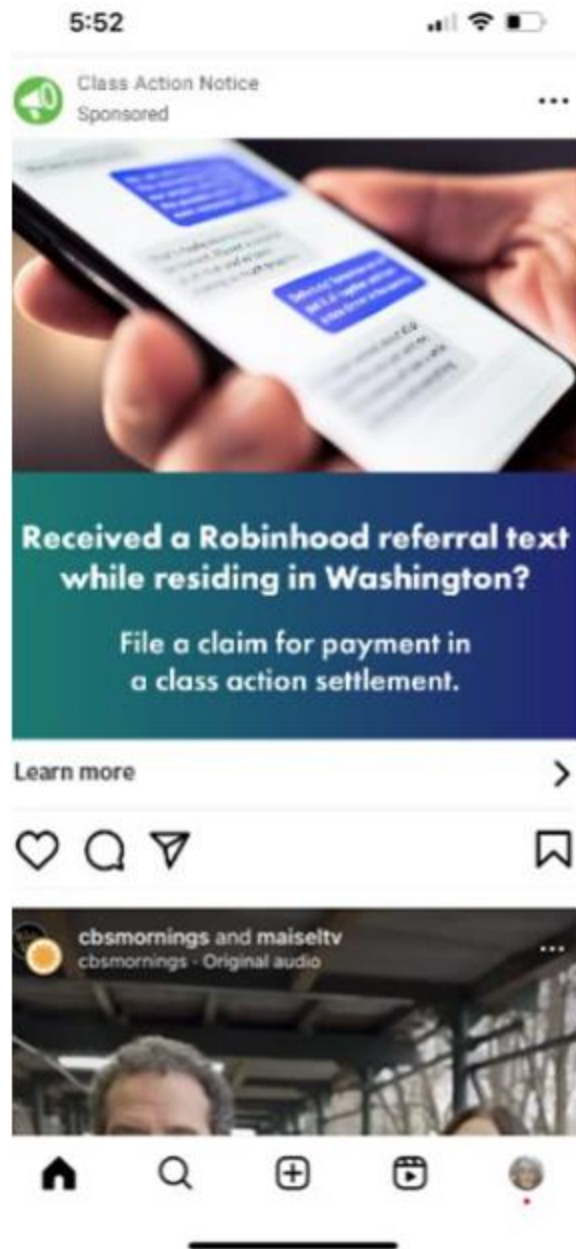














5:53

**Class Action Notice**  
Sponsored

**Received a Robinhood  
referral text while  
residing in Washington?**

File a claim for payment in  
a class action settlement.

**Learn More**

The image shows a mobile application interface. At the top, the status bar displays the time 5:53, signal strength, Wi-Fi, and battery icons. Below this is a header with a green megaphone icon, the text 'Class Action Notice', and 'Sponsored'. To the right of the header are three dots and a close 'X' icon. The main content area has a dark blue background with white text. The headline asks 'Received a Robinhood referral text while residing in Washington?'. Below it, in smaller white text, it says 'File a claim for payment in a class action settlement.' The bottom half of the screen features a blurred image of a hand holding a smartphone, which displays several text messages. One message is highlighted with a blue box and contains the text 'Robinhood Technologies and its affiliates are not a data broker in the state of Washington'. At the very bottom, there is a dark navigation bar with a 'Learn More' button and a small white triangle icon.



# EXHIBIT G





Robinhood class action settlement



Business Wire

<https://www.businesswire.com> › news › home › BREAKI... ⋮

## ROSEN, A LEADING LAW FIRM, Announces Investigation ...

Jan 28, 2021 — BREAKING ALERT: ROSEN, A LEADING LAW FIRM, Announces Investigation of Market Manipulation **Claims** Against **Robinhood** Financial, LLC, **Robinhood** ...



Dataconomy

<https://dataconomy.com> › 2022/11/24 › robinhood-acco... ⋮

## Robinhood Account Takeover Settlement: Claim Form ...

Nov 24, 2022 — Although **Robinhood** hasn't admitted any wrongdoing, the **claims** will be resolved through a \$20 million **class action settlement**. **Robinhood** has set ...

### Sponsored



[www.robinhoodreferralsettlement.com/](http://www.robinhoodreferralsettlement.com/)

## Robinhood Referral Text - Class Action Settlement

File a claim for payment in a class action settlement affecting Robinhood text recipients.

Payment available to recipients of a Robinhood referral text while residing in Washington.

[Key Dates](#) · [Important Documents](#) · [File a claim](#)



10:41



Bloomberg Law News

<https://news.bloomberglaw.com> · ...

## Robinhood Gets Final OK for \$9.9 Million Settlement Over Outages

Jul 19, 2023 — Robinhood Financial LLP will pay \$9.9 million to settle a class action filed by investors who claim they suffered financial losses after the ...



Top Class Actions

<https://topclassactions.com> · privacy

## \$20M Robinhood data breach settlement receives final approval

A California federal judge approved a nearly \$20 million deal between a group of customers and Robinhood Financial LLC. U.S. District Judge Susan van Keulen ...

**Sponsored**[www.robinhoodreferralsettlement.com/](http://www.robinhoodreferralsettlement.com/)

## Robinhood Referral Text - File a Claim for Payment

Payment available to recipients of a Robinhood referral text while residing in Washington. File a claim for payment in a class action settlement affecting Robinhood text recipients.

[File a claim](#)[Key Dates](#)



# EXHIBIT H



# If you received a Robinhood referral text message while residing in Washington, you may be entitled to payment in a class action settlement

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NEWS PROVIDED BY  
**JND Legal Administration →**  
14 Mar, 2024, 09:42 ET

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SEATTLE, March 14, 2024 /PRNewswire/ -- JND Legal Administration

A proposed \$9 million settlement has been reached in a class action lawsuit entitled *Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (W.D. Wash.) (the "Lawsuit"). The Settlement has not been approved by the Court yet. Settlement Class Member must submit a valid Claim Form by **May 13, 2024** to receive a payment. Payments are estimated to be between \$45 and \$90 per Settlement Class Member that files a timely and valid Claim Form. You may submit a Claim Form online at [\*\*www.RobinhoodReferralSettlement.com\*\*](http://www.RobinhoodReferralSettlement.com).

## What is this about?

The Lawsuit claims that Robinhood Financial LLC ("Robinhood" or "Defendant") violated Washington state laws, including Washington's Commercial Electronic Mail Act ("CEMA") and the Washington Consumer Protection Act ("CPA"), by substantially assisting Robinhood users in the transmission of unsolicited commercial text messages to prospective customers as a part of its refer-a-friend marketing program. Specifically, the Class Representatives allege that Robinhood's trading app allowed users to generate and send pre-filled text messages to users' contacts without first obtaining the recipients' clear and affirmative consent to receive commercial text messages. Under these laws, a person is entitled to \$500 for each unlawful text message and a court may award an additional payment up to \$1,500, as well as reasonable attorneys' fees and costs.





Robinhood denies any wrongdoing and the Court has not decided whether Robinhood did anything wrong. Robinhood has asserted defenses that it believes would be successful at trial. In agreeing to settle, Robinhood maintains that it complied with the law and does not admit any wrongdoing. The Lawsuit is proceeding in the United States District for the Western District of Washington before the Honorable Judge Barbara J. Rothstein.

For additional details regarding the Lawsuit and your rights, visit

**[www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com)**.

### **Am I a Settlement Class Member?**

You are a Settlement Class Member if you (1) received a Robinhood referral program text message between August 9, 2017 and February 13, 2024; (2) were a Washington resident at the time you received the text; and (3) you did not clearly and affirmatively consent in advance to receive the text.

### **Your legal rights and options.**



- **File a Claim Form by May 13, 2024.** If you are a member of the Settlement Class, you have a right to complete a Claim Form to receive a Settlement payment, estimated to be between \$45 and \$90 per Settlement Class Member, although the actual amount could be higher or lower depending on how many valid Claim Forms are received. A Claim Form can be obtained from the settlement website at [www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com). A Claim Form can be (a) completed and submitted electronically on the website, or (b) printed, completed, and submitted by mail. If your Claim Form is approved and the Settlement is approved by the Court and becomes final, you give up your right to bring your own lawsuit about the issues in this Lawsuit.
- **Do Nothing.** If you do nothing and the Settlement becomes final, you will not receive a Settlement payment and you give up your right to bring your own lawsuit about the issues in this Lawsuit.
- **Exclude Yourself by May 13, 2024.** If you exclude yourself from the Settlement (also called "opting out"), you give up your right to receive a Settlement payment, but you keep any rights you may have to bring your own lawsuit about the issues in this Lawsuit. To exclude yourself from the Settlement Class, you must mail a written "Request for Exclusion" to the Settlement Administrator that is postmarked by **May 13, 2024**. Your written request must include: (i) your name, address, and telephone number; (ii) a statement confirming that you want to exclude yourself from the Settlement Class; (iii) the case name and number (*Moore v. Robinhood Financial LLC*, No. 2:21-cv-01571-BJR (W.D. Wash.)); and (iv) your signature and the date.
- **Object or Comment by May 13, 2024.** If you do not exclude yourself from the Settlement, you may object to or comment about the Settlement and/or Class Counsel's request for attorneys' fees, expenses, and service awards to the Class Representatives who brought this Lawsuit.

### Who represents me?

The Court has appointed a team of lawyers from Terrell Marshall Law Group PLLC and Berger Montague PC to serve as Class Counsel. They will ask the Court to pay them attorneys' fees not to exceed 25% of the \$9 million settlement fund (\$2,250,000), out of pocket costs currently estimated to be \$151,215, and Class Representative Awards of \$10,000 each to Plaintiffs Cooper Moore and Andrew Gillette (\$20,000 total).

### When will the Court consider the Settlement?



The Court will hold a Final Approval Hearing at 10:00 a.m. Pacific on July 16, 2024. At that hearing, the Court will hear any objections concerning the fairness of the Settlement, decide whether to approve the requested attorneys' fees and costs, Class Representative awards, and determine whether the Settlement should be approved. You do not have to attend the Final Approval Hearing, but you are welcome to come at your own expense.

### **Where can I get more information?**

A more detailed notice and important case documents are at **[www.RobinhoodReferralSettlement.com](http://www.RobinhoodReferralSettlement.com)**. If you have any questions, please contact the Settlement Administrator at 877-231-0646. Do not contact the Court with questions.

SOURCE JND Legal Administration



# EXHIBIT I





**ROBINHOOD REFERRAL SETTLEMENT**  
**(USDC WESTERN DISTRICT OF WASHINGTON, CASE NO. 2:21-cv-01571-BJR)**

**TIMELY AND VALID EXCLUSIONS**

	<u>JND ID NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>
1.	N276PELZS5			March 29, 2024	Ink	N/A
2.	NEMQ7LKBRH			April 16, 2024	Ink	N/A
3.	NJERM2LDZX			April 29, 2024	Ink	N/A
4.	N2Q653XBWN			May 6, 2024	Ink	N/A
5.	NM9G75FBNW			May 13, 2024	Ink	N/A